

SUMMARY OF ATTACHMENTS

The following documents are attached to this Motion, labeled in accordance with Local Bankruptcy Rule 9014-1(b):

Exhibit 1 – Proposed Form of Order

Exhibit 2 – Notice of Motion and Opportunity to Object

Exhibit 3 – None [Brief Not Required]

Exhibit 4 – None [Separate Certificate of Service to Be Filed]

Exhibit 5 – None [No Affidavits Filed Specific to This Motion]

Exhibit 6 –

Exhibit A – May 8, 2014 Email from Robert A. Schwinger

Exhibit B – May 8, 2014 Letter from Geoffrey S. Irwin

Exhibit 1

Proposed Order

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

	:
In re:	: Chapter 9
	:
CITY OF DETROIT, MICHIGAN,	: Case No. 13-53846
	:
Debtor.	: Hon. Steven W. Rhodes
	:

**ORDER GRANTING MOTION TO COMPEL FULL CLAWBACK OF
DEBTOR’S DOCUMENT PRODUCTION AND RELATED RELIEF**

This matter having come before the Court on the motion of creditors Assured Guaranty Municipal Corp., formerly known as Financial Security Assurance Inc. (“Assured”), National Public Finance Guarantee Corporation (“National”), and Ambac Assurance Corporation (“Ambac”) (collectively the “Movants”) to compel the Debtor, the City of Detroit (the “City” or “Debtor”) to claw back improperly produced documents (the “Motion to Compel”), the Court, having reviewed the Movant’s Motion to Compel, and having determined that the legal and factual bases set forth in the Motion to Compel establish just cause for the relief granted herein:

IT IS HEREBY ORDERED THAT:

1. The Movants' Motion to Compel is GRANTED;
2. The City shall immediately take affirmative action to recall its entire production of documents from all recipients;
3. All parties who received the City's May 6, 2014 document production shall return the media that the City distributed, purge any electronic copies made thereof or of any portion thereof, and destroy any physical copies made therefrom; and
4. The City shall correct its document production to eliminate all mediation-related documents the production of which is barred by the Mediation Order and distribute corrected document production media to the parties as soon as possible.

IT IS SO ORDERED

STEVEN W. RHODES
United States Bankruptcy Judge

Exhibit 2

Notice of Motion and Opportunity to Object

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:

:

: Chapter 9

:

CITY OF DETROIT, MICHIGAN,

: Case No. 13-53846

:

Debtor.

: Hon. Steven W. Rhodes

:

**NOTICE OF MOTION TO COMPEL FULL CLAWBACK OF
DEBTOR'S DOCUMENT PRODUCTION AND RELATED RELIEF**

PLEASE TAKE NOTICE that on May 9, 2014, the Movants filed the *Motion to Compel Full Clawback of Debtor's Document Production and Related Relief* (the "Motion to Compel" in the United States Bankruptcy Court for the Eastern District of Michigan (the "Bankruptcy Court") seeking to compel the City to claw back improperly produced documents.

PLEASE TAKE FURTHER NOTICE that your rights may be affected by the relief sought in the Motion. You should read these papers carefully and discuss them with your attorney, if you have one. If you do not have an attorney, you may wish to consult one.

PLEASE TAKE FURTHER NOTICE that if you do not want the Bankruptcy Court to grant the Movants' Motion to Compel or you want the

Bankruptcy Court to consider your views on the Motion to Compel, by May 23, 2014¹, you or your attorney must:

File with the Bankruptcy Court a written response to the Motion to Compel, explaining your position, electronically through the Bankruptcy Court's electronic case filing system in accordance with the Local Rules of the Bankruptcy Court or by mailing any objection or response to²:

United States Bankruptcy Court
Theodore Levin Courthouse
231 West Lafayette Street
Detroit, MI 48226

You must also serve a copy of any objection or response upon:

Lawrence A. Larose
Samuel S. Kohn
Eric Daucher
CHADBOURNE & PARKE LLP
30 Rockefeller Plaza
New York, NY 10012
Telephone: (212) 408-5100
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edaucher@chadbourne.com

¹ Concurrently herewith, the Movants are seeking expedited consideration and shortened notice of the Motion. If the Court grants such expedited consideration and shortened notice, the Movants will file and serve notice of the new response deadline.

² A response must comply with F. R. Civ. P. 8(b), (c) and (e).

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Counsel for Ambac Assurance Corporation

If an objection or response is timely filed and served, the clerk will schedule a hearing on the Motion to Compel and you will be served with a notice of the date, time and location of the hearing.

PLEASE TAKE FURTHER NOTICE that if you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the Motion to Compel and may enter an order granting such relief.

Dated: May 8, 2014

By: /s/ Lawrence A. Larose

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Samuel S. Kohn

By: /s/ Louis P. Rochkind

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Exhibit 3

None [Brief Not Required]

Exhibit 4

Certificate of Service [To be filed separately]

Exhibit 5

Affidavits [Not Applicable]

Exhibit 6

Documentary Exhibits